

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Melrose Mindoro School District

Agency Code: 273428

School(s) Reviewed: Melrose Elementary/Junior High School

Review Date(s): March 29-31, 2017

Date of Exit Conference: March 31, 2017

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the [DPI SNT webpage](#).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the [DPI SNT GOALS webpage](#).
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the [DPI SNT Financial Management webpage](#) under the *Unpaid Meal Charges* section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Melrose-Mindoro School District for the courtesies extended during the on-site review. Thank you for taking the time to respond to the off-site questions as well as pulling records for the on-site portion of the review, being available for in-person questions and for providing additional information when requested. All were very receptive to recommendations and guidance. It was a pleasure visiting Melrose-Mindoro School District.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

176 eligibility determinations were reviewed, zero (0) errors were identified. Thank you to the Determining Official (DO) for being available to answer questions, clarify information and follow-up with households when necessary. The DO is detail-oriented and organized, two excellent characteristics for processing and distributing meal benefits. Kudos for a job well done!

Household Size Box

If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the SFA is required to follow up with the household to clarify the correct number of people in the household and ensure all household member have been included on the application before an eligibility determination is made.

If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional Office, any application that does not have this box completed is considered an incomplete application.

Disclosure

SFAs must seek written consent from the household to use information provided on the meal application or through DC for non-food service program purposes, such as athletic or testing fee waivers. Consent must be obtained each school year. A template [Sharing Information Form](#) is located on the [DPI SNT Free and Reduced Meal Applications and Eligibility webpage](#).

Alternatively, a SFA can ask programs requesting benefit information to have households self-disclose by providing a copy of their [Letter to Households of Approval/Denial of Benefit](#) notification letter. This option is encouraged as it reduces administrative recordkeeping for food service.

A [Disclosure Agreement](#) form should be signed and on file at the SFA for anyone receiving eligibility information to approve students for non-food service program benefits or with access to the meal benefit information. This form can be found on the [DPI SNT Free and Reduced Meal Applications and Eligibility webpage](#).

Effective Date of Eligibility

SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is received if a process is in place to capture when the application is received. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The DPI SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

The SFA currently date stamps all applications but has not applied for the flexibility as it has been successful in processing applications received during the school year on the same day. The SFA is encouraged to consider applying for this flexibility as a safe guard for approving applications in a timely manner.

Incomplete Applications

Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone, or in writing, including email. The Determining Official (DO) should document the details of the conversation, date, and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Transferring Students

SFAs can share eligibility data with other districts when requested for specific students but are not required to do so, as noted on page 39 of the [Eligibility Manual for School Meals](#).

If a student(s) received free meals via Direct Certification (DC) at a previous SFA, a copy of the original DC run with all names blacked out except for the student(s) requesting free meals should be obtained from the previous SFA. The date of the DC run as well as the match code for the student(s) should be visible to the new SFA. If a student received free meals via application at a previous SFA, a copy of the original application should be obtained. Alternatively, the student(s) can be run individually through DC or complete a new meal application with the new SFA.

Applications and Notification Letters

The [Instructions/How to Apply](#) and [Parent/Guardian Information Letter/Frequently Asked Questions](#) were not included with the distribution of the [Free and Reduced-Price Meal Application](#). These two forms are required to be distributed with the application. Please see the *Corrective Action* below that addresses this *Finding*.

When using non-DPI template letters, the SFA should compare their letters with the template letters and the requirements in the [Eligibility Manual for School Meals](#) to ensure all required information is included. The USDA Non-discrimination Statement *must* be included on all communications with households **and** in the same size font as the most commonly used font in the document. Additionally, the SFA is encouraged to include a detachable slip with their Direct Certification notification letter for families to return to the SFA, like the [template Direct Certification notification letter](#).

Limited English Proficiency (LEP)

Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.

To assist SFAs in reaching households with limited English proficiency, the DPI SNT provides the Wisconsin-ized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, Hmong and Albanian on the [DPI SNT Free and Reduced Price Meal Applications and Eligibility webpage](#).

Public Release

The SFA did not send out the NSLP/SBP Public Release for SY 16-17. As a reminder, the SFA should send the public release to media and grassroots organizations. In addition, the SFA should send the release to major employers contemplating or experiencing large layoffs and local unemployment offices, as applicable. Please see the *Corrective Action* below that addresses this *Finding*.

Verification

The SFA completed verification within the designated timeframes. The appropriate number of applications were selected for verification. Documentation indicated a confirmation review took place by the Confirming Official (CO). All selected applications were correctly verified.

Meal Counting and Claiming

Breakfast was observed on Thursday, March 30, 2017 at Melrose Elementary/Junior High School. Reimbursable meals were correctly identified and claimed. No meal counting errors were observed.

Lunch was observed on Thursday, March 30, 2017 at Melrose Elementary/Junior High School. Reimbursable meals were correctly identified and claimed. No meal counting errors were observed.

The February 2017 claims for reimbursement for the National School Lunch Program (NSLP) and School Breakfast Program (SBP) were reviewed and validated. An over-claim of one (1) reduced meal was noted for the NSLP claim for reimbursement. No errors were identified in the SBP claim for reimbursement.

Please see the *Finding* and *Corrective Action* below that addresses the NSLP claiming error.

Finding #1: An over-claim of one (1) paid meal was noted for the NSLP claim for reimbursement.

Corrective Action Required: Please submit an explanation detailing the reason for the over-claim and how the SFA will ensure correct claims for reimbursement in the future.

Finding #2: The NSLP/SBP Public Release was not distributed for SY 16-17.

Corrective Action Required: Please submit a summary noting how the SFA will ensure distribution of the NSLP/SBP Public Release for SY 17-18. Please include the locations/publications of where NSLP/SBP Public Release will be distributed.

Finding #3: The [Instructions/How to Apply](#) and [Parent/Guardian Information Letter/Frequently Asked Questions](#) were not included with the distribution of the [Free and Reduced-Price Meal Application](#). These two forms are required to be distributed with the application.

Corrective Action Required: Please submit a summary detailing how the SFA will ensure these two forms are included with the application moving forward, both paper and electronic versions (i.e. website, electronic newsletters, etc.)

Finding #4: Edit checks are not being reviewed for breakfast prior to submission of the claim for reimbursement.

Corrective Action Required: Please submit a summary detailing how the SFA will ensure review of breakfast edit checks moving forward. Please include March 2017 breakfast edit checks and supplementary information for any questionable meal counts, if any.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service staff for providing documentation prior to the review. Documentation was thorough and well organized. All of my questions were answered very quickly which helped to expedite the process of reviewing meal pattern compliance. Students are offered a menu with nice variety as well as a garden bar daily. It is clear that staff at Melrose Mindoro are knowledgeable about meal pattern requirements and work hard to provide quality meals to the students.

Standardized recipes:

The spaghetti sauce recipe was missing information required of a standardized recipe. The Standardized recipe checklist and a multiple grade group recipe template were provided prior to the on-site review. Additionally, the crediting of the recipe was calculated and determined to be 1.25 oz eq of meat/meat alternate per serving rather than 1 oz eq.

Production records:

Currently, the production records being used do not document all of the required information. While there is not a certain template that must be used, it will be necessary to either update the current template or switch to a new production record template. The list of production record requirements, instructions, and templates are available on our website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menuplanning/production-records>.

- The planned number of servings for each menu item should be documented as well as the actual number of serving prepared.
- Records should be updated to show K-2 and 6-8 instead of K-5 and 6-8.

Crediting:

Some items such as the orange chicken and taco meat are credited based on the weight of the serving provided. The school is properly using those weights to determine the volume that must be provided. It is recommended that the volume needed for the desired weight and crediting be documented somewhere (such as on the production record, copy of the CN label/PFS or on a recipe) to aid in menu planning, purchasing and service.

Training:

Ongoing training is essential to staying informed of school meal requirements. It is strongly recommended that in addition to attending in person trainings (such as SNSDC), you utilize the SNT website for resources, including training webcasts that can be watched at your convenience. A list of all available training webcasts can be found at <http://dpi.wi.gov/school-nutrition/training/webcasts>.

Finding #5: The standardized recipe provided for the spaghetti sauce is not complete.

Corrective Action Required: Please provide and updated recipe for the spaghetti sauce.

Finding #6: The K-2 students did not meet the minimum weekly requirement of ½ cup for the starchy vegetable subgroup. The only vegetable offered from this subgroup was ¼ cup of potatoes on Tuesday.

Based on discussions prior to the on-site review, the serving size will be changed to ½ cup.

Corrective Action Required: *No further action needed.*

Offer versus Serve

Staff at Melrose-Mindoro Elementary/Junior High School were knowledgeable on the requirements of reimbursable meals for breakfast and lunch. However, as all fruit and vegetables, aside from whole apples, were served in portions less than ½ cup for students in grades K-2, the individual at the Point of Service (POS) was left to add multiple servings of different fruits and vegetables to ensure each meal was reimbursable. On the day of observations, students with less than ½ cup fruit and/or vegetable were asked to return to the line for more by either the person at the POS or the FSD attending meal service observation. It was noted by the FSD and DPI that production records indicated a ½ cup portion was to be served of both mandarin oranges and apples. Much discussion was had on the importance of following production records as it access to the full portion students are entitled to and to assist the individual at the POS with determining if a meal meets the requirements for reimbursement. Food waste was noted as a reason for offering smaller portions. Discussion continued on options for meeting the requirements for reimbursement while monitoring food waste including signage, altering portion sizes of other fruits and/or vegetables with the guidance of the FSD, and continuing to educate students on what they are required to take as part of a reimbursable meal. While no non-reimbursable meals were observed, in-part from students being sent back to select larger portions, additional training and education on OVS is encouraged to ensure production records are being followed and all students are selecting reimbursable meals.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Access to the SFA's Child Nutrition Report, which provides a compilation of meals claimed, reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast, is described in the document [Viewing the Child Nutrition Report](#). The DPI Aids Register is also available to track all program deposits made to the SFA's account as well as the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. The Aids Register is available on the DPI SNT [Financial Management webpage](#). Both resources are also accessible from the [Online Services webpage](#).

Annual Financial Report

In SY 16-17, all revenues including reimbursements and student payments and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. Please note there are additional categories than in previous years:

- **NSL** - schools participating in the National School Lunch Program.
- **SB, SBSEVERE** - both regular School Breakfast and Severe Need Breakfast.
- **SK-NSL, SK-NSLAE** - both After School Snacks and Area Eligible Afterschool Snacks.
- **SMP** - Special Milk Program.
- **Grants** - all grant awards and expenditures.
- **WSDMP** - Wisconsin School Day Milk Program.
- **EN** - Elderly Nutrition.
- **Nonprogram Foods** - all Nonprogram Foods (including: a la carte items, adult meals, milk only, extra entrees, vended meals sold under a joint agreement, catered meals, vending machines, etc.)
- **CACFP** - daycare and supper meals claimed under Child and Adult Care Food Program.
- **SFSP** - meals claimed in Summer Food Service Program.

The [new SY 16-17 Annual Financial Report instructions](#) are located on [DPI SNT Financial Management webpage](#).

The SFA flagged for a comprehensive resource management review in the *Nonprofit School Food Service Account* section as figures on the Food Service Annual Financial Report did not match district figures reported to DPI. Please see the *Finding* and *Corrective Action* below that addresses this issue.

Unpaid Meal Charge Policy

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](#). For a more comprehensive overview, see [SP 58-2016: Unpaid Meal Charges Guidance](#). In addition, bad debt is an unallowable expense to the food service program. A transfer of non-federal funds must be made to cover student account write-offs, as noted in [SP57-2016 Unpaid Meal Charges Guidance](#).

Paid Lunch Equity

The SFA is in compliance with PLE.

Revenue from Nonprogram Foods

The SFA flagged for a comprehensive resource management review in the *Revenue from Nonprogram Foods* section as it sells nonprogram foods. Please see the *Finding and Corrective Action* below that addresses this flag.

Nonprogram foods include:

- Adult Meals
- A la Carte
- Extra Entrees
- Extra Milk (for cold lunch or milk break),
- Vended Meals (meals sold to other agencies)
- Catered Meals
- Vending Machines operated by Food Service

All nonprogram food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals nor be absorbed by the food service account. Nonprogram food costs and revenues must be separated from program food costs and revenues. In regards to adult meals, food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5, which are outlined in the [Wisconsin Adult Meal Pricing Worksheet](#). SFAs must reassess adult meal prices annually prior to contract submission to ensure student reimbursement is not being used to subsidize adult meals.

At a minimum, the [USDA Nonprogram Food Revenue Tool](#) must be completed yearly. The [DPI Nonprogram Food Revenue Tool/Calculator](#) aids in calculating prices of nonprogram foods and feeds into the USDA Nonprogram Food Revenue Tool to determine compliance with USDA nonprogram food regulations.

To complete the USDA Nonprogram Food Revenue Tool, the SFA must select a reference period of at least 5 consecutive operating days of a regular school week, and compare the reference period revenue ratio to the food cost ratio for the entire SFA to determine if the revenue ratio is equal to or greater than the food cost ratio (see Figure 1 below). Rather than separating all costs for the entire year (although recommended), SFAs must separate their non-program food costs from their program food costs for the selected period to complete the Tool. If the revenue ratio is equal to or greater than the food cost ratio, the SFA is in compliance.

$$\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} \geq \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$$

Figure 1 - Nonprogram Foods Revenue and Costs Ratio

Nonprogram food revenue is the dollar amount of nonprogram food sales sold through the nonprofit school food service account including la carte sales, adult meals, vending machines, extra/cold lunch milks, etc. Total program and nonprogram revenue includes the dollar amount from program and nonprogram food sales.

If using the DPI Nonprogram Food Revenue Tool/Calculator to complete the USDA Nonprogram Food Revenue Tool (recommended), to determine nonprogram food cost data, gather an itemization of all nonprogram foods offered during the selected reference period and enter the per item raw food cost of each nonprogram food and the number of servings/items sold in the selected reference period. For total program and nonprogram food costs, include all program and nonprogram food costs. Program food costs data should be available using production records, invoices, etc.

The [Nonprogram Foods Revenue Rule SP 20-2016](#) and the [Nonprogram Foods In a ‘Nutshell’](#) can provide additional guidance and clarification on nonprogram foods.

Indirect Costs

The SFA flagged for a comprehensive resource management review in the *Indirect Costs* section as it was noted that the food service account (Fund 50 within WUFAR) is charged a percentage (0.03%) for liability insurance, workers’ compensation, and property insurance. DPI does not allow the annual assigned indirect cost rate or any indirect costs to be applied to Fund 50. For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.

Conversations with a DPI accountant provided the following guidance:

- **Worker’s Compensation:** The district should allocate the entire cost based upon the total salary expenditures in Fund 50 as a percentage of total salaries at the district.
- **Liability Insurance:** The district should charge this to the General Fund as it is a cost that would be incurred even without operation of the National School Lunch Program (NSLP).
- **Property Insurance:** The district should charge this expense to the General Fund as it is a cost that would be incurred even without operation of the NSLP unless there is supporting documentation that ties the property insurance specifically to food service.

Please see the *Finding* and *Corrective Action* below that requests clarification on how the district will handle these costs in the future.

Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:

- Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
- Utility charges - separately metered or current usage study by the local utility company.
- Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
- Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from district's total.

Finding #7: Figures from the SY 15-16 Food Service Annual Financial Report did not match district figures reported to DPI.

Corrective Action Required: Please review the SY 15-16 Food Service Annual Financial Report figures along with district figures submitted to DPI. Of benefit to the district would be reviewing resources on the [DPI SNT Financial Management website](#). Beginning and ending fund balances should match on both the Food Service Annual Financial Report and the district figures submitted to DPI. Please submit corrections to the SY15-16 Food Service Annual Financial Report.

Finding #8: The USDA Nonprogram Food Revenue Tool was not fully completed by the SFA. Technical assistance was provided to the FSD during the on-site.

Corrective Action Required: Please submit a completed USDA Nonprogram Food Revenue Tool. If the Tool comes out in the red, requiring *Additional Revenue to Comply*, please submit a plan going forward for how the SFA will comply with the shortfall (i.e. raise nonprogram food prices and/or contribute non-federal funds to meet the required ratio. Please note, the SFA is encouraged to use the DPI Nonprogram Food Revenue Tool/Calculator which feeds into the USDA Nonprogram Food Revenue Tool.

Finding #9: The food service account (Fund 50 within WUFAR) was charged a percentage (0.03%) for liability insurance, workers' compensation, and property insurance. DPI does not allow the annual assigned indirect cost rate or any indirect costs to be applied to Fund 50. All costs must be made a direct cost with supporting documentation to justify the cost.

Corrective Action Required: Please submit a summary detailing how the district will handle these costs in the future.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Nondiscrimination Statement

The SFA is reminded that the [USDA non-discrimination statement](#) must be in the same size font as the most commonly used text in the document. When space is limited, such as on printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**”

And Justice for All Poster

An “And Justice for All” poster was available and readable in the cafeteria.

Civil Rights Training

Civil rights training had been completed and documentation was available for review.

Civil Rights Self-Compliance Form

The Civil Rights Self-Evaluation Compliance form was completed by October 31st. As noted in the *Finding and Corrective Action* above, the district did not send out the NSLP/SBP Public Release for SY 16-17. Technical assistance was provided to the FSD on areas in question. The FSD was also reminded that the ‘denied applications’ category must be completed and reviewed.

Special Dietary Needs

All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical practitioner. SFAs may use the [template Medical Statement Form](#) posted on the [DPI SNT Special Dietary Needs webpage](#). This template is also available in Spanish and Hmong. SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner.

School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA still have a completed [Medical Statement Form](#) on file from a medical authority, such as a school nurse, to support the request. These types of accommodations must be made according to the USDA’s meal pattern requirements in order for the meals to be claimed for reimbursement. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are being handled equitably.

Processes for complaints

As a reminder, all verbal or written civil rights complaints regarding USDA Child Nutrition Programs that are filed with the SFA must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. The [USDA Program Discrimination Complaint Form](#) is available to assist in filing these complaints and can be found on the [DPI SNT Civil Rights webpage](#).

Local Wellness Policy (LWP)

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires SFAs to begin developing a revised local school wellness policy during SY 16-17 and full compliance with the requirements of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. SFAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years (triennial assessment) to determine compliance with the policy, how the policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the triennial assessment, as well as the wellness policy and any updates to the policy, available to the public.

A summary of the requirements can be found at:

http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

The SFA's Local Wellness Policy (LWP) was reviewed and the SFA is reminded of the following:

- Food and beverage marketing guidelines should be included in the LWP, specifically noting that SFAs may only market products that adhere to Smart Snacks during the school day.
- The LWP should contain language regarding Smart Snack Standards
- Language should be included regarding the triennial assessment and how the results of the assessment will be made available to the public.

Kudos to the district and its wellness committee for review and assessment of the policy in recent years. By the wellness committee's meeting minutes, it is clear the policy is utilized as a guide for health and wellness in the district.

On-site Monitoring

The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) established the requirement to conduct on-site monitoring of the School Breakfast Program beginning in SY 16-17. The requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information, see [USDA Memo SP 56-2016](#). The [National School Lunch Program On-site Monitoring Form](#) and [School Breakfast Program On-site Monitoring Form](#) are currently available on the [DPI SNT Administrative Review webpage](#).

Breakfast and lunch monitoring forms were available for all schools in the SFA

Smart Snacks

All foods (vending machines, a la carte, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the Smart Snacks rule that went into effect on July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

The ice cream treats sold on Friday had been run through the product calculator and print outs were provided prior to the review. Great job ensuring that compliant products are being sold!

The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. Exempt fundraisers cannot exceed two consecutive weeks in length and cannot occur in the meal service area during meal time.

Professional Standards

The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked. Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.

Training requirements for all staff are as follows:

Directors	Managers	Other Staff	Part Time Staff
	(20 hrs or more/week)	(less than 20 hrs/week)	
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
8 hours	6 hours	4 hours	4 hours
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

The SFA provides yearly and on-going training throughout the school year. All staff have met continuing education requirements for SY 2016-2017. The SFA is reminded that in regards to Professional Standards, full time is >20 hours per week while part-time is <20 hours/week. If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

Water

Water is required and available at no charge to students during lunch and breakfast service. Water was available at lunch and breakfast via a drinking fountains outside of the cafeteria. While meeting the requirement via the drinking fountain, the district is encouraged to consider a water cooler or pitcher with cups in the cafeteria to encourage consumption.

Food Safety and Storage

Food Safety Inspections

The most recent food safety inspection was posted in the kitchen. It is a requirement of USDA Child Nutrition Programs that the most recent food safety inspection be posted in a publically visible and readable location. Thank you for the FSD for her prompt movement of the inspection to a publically visible and readable location.

Food Safety Plan

The food safety plan was available for review.

Temperature Logs

All temperature logs and signed Employee Reporting Agreements were up-to-date and available for review.

Buy American

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in school meal programs as well as supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf. The Buy American provision should be included in solicitations, contracts, and product specifications.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

SFAs must monitor contractor performance to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. This is accomplished by ensuring the product label designates the United States, or its territories, as the country of origin. Therefore, SFAs must ensure that products delivered comply with any Buy American contract provisions by reviewing products and/or delivery invoices/receipts to identify the country of origin is the United States or its territories. SFAs also need to conduct a periodic review of storage facilities, freezers, refrigerators, dry storage, and warehouses to ensure products comply with the Buy American provision, unless a limited exception has been approved.

The following items were found to be non-compliant during the on-site review:

- Mandarin Oranges – China (Non-compliant product list on file)
- Tomatoes – Mexico
- Cucumbers – Honduras
- Pineapple – Thailand (Non-compliant product list on file for Indonesia, not Thailand)

The SFA should work with its distributor to determine if these products are available domestically. If not, documentation requested in the [Non-compliant Product List](#) should be obtained. Please note, the use of this form is the exception, not the rule. More information on this new requirement can be found on the [DPI SNT Procurement webpage](#). The SFA is encouraged to ask questions on this regulation during their Procurement Review.

Reporting and Recordkeeping

Thank you for completing the required USDA and DPI reports and for maintaining the paperwork in an organized manner. The SFA is meeting record retention requirements for USDA Child Nutrition Programs.

School Breakfast Program (SBP) Outreach

The SFA participates and meets promotion requirements for the School Breakfast Program (SBP).

Summer Food Service Program (SFSP) Outreach

The SFA participates in the Summer Food Service Program and meets promotion requirements for the program as part of participation in the National School Lunch Program (NSLP).

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

The WSDMP was observed in two classrooms at Melrose Elementary/Junior High School. It was noted by one instructor that milk was being withheld from one student for disciplinary reasons. It is not allowable to withhold milk in the WSDMP for disciplinary reasons. Additionally, review the SY 15-16 WSDMP claim for reimbursement indicated inaccurate figures were submitted. As the claim as already been paid, a *Finding* and *Corrective Action* has been noted below to address how the district will ensure accurate claims in the future.

Additional WSDMP reminders include:

- Schools must serve Wisconsin-produced milk. Please verify this with your distribution and include in your milk bid.
- Students of paid meal status that take milk during the operation of the WSDMP cannot be claimed in the program and must be assessed a charge for the milk. If the SFA wishes to provide milk to paid students free of charge, it can but the cost cannot be absorbed by the food service account. A transfer from an outside fund (i.e. SFA's General Fund/Fund 10) to the non-profit food service fund would need to be completed.

Finding #10: Milk cannot be withheld for disciplinary reasons.

Corrective Action Required: Please provide a summary of how this *Finding* was remedied.

Finding #11: Inaccurate milk count figures were submitted for SY 15-16.

Corrective Action Required: As this claim has already been paid, please provide a summary moving forward detailing how the SFA will ensure accurate WSDMP claims into the future.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called "Agenda 2017". His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the [Wisconsin DPI Every Child a Graduate webpage](#).

